

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ARLENE DELGADO,

Civil Case No.: 19-cv-11764

Plaintiff,

-against-

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC.,
SEAN SPICER, individually,
REINCE PRIEBUS, individually,
STEPHEN BANNON, individually,

Defendants.

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NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Abraham Z. Melamed, Esq., dated June 16, 2020, with exhibits, supported by the points and authorities set forth in the accompanying memorandum of law, dated June 16, 2020, and all prior proceedings, Plaintiff, Arlene Delgado, will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, before the Honorable Analisa Torres, for an Order, pursuant to Federal Rule of Civil Procedure Rule 65, enjoining the Defendants from pursuing claims against Plaintiff, either in the pending arbitration *Donald J. Trump for President, Inc. V. Arlene Delgado* (JAMS reference 01-17-0004-4706, or otherwise, alleging that Plaintiff breached a Confidentiality Agreement.

Dated: Los Angeles, California June 16, 2020

DEREK SMITH LAW GROUP, PLLC
Attorneys for Plaintiff

/s/Abraham Z. Melamed
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